

IN THE SUPREME COURT OF THE UNITED STATES

OLGA PALAMARCHULK

Petitioner,

v.

UNITED STATES OF AMERICA

Respondent

**ON PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Reply in Support of Petition for Writ of Certiorari contains 1,089 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the
foregoing is true and correct.

Executed on May 11, 2020

/s/Michael B. Bigelow
Michael B. Bigelow
1621 McLaren Drive
Carmichael CA 95608
(916) 201-8766
Attorney for Petitioner